

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: PORK ANTITRUST LITIGATION

Case No. 0:18-cv-01776-JRT-JFD

This Document Relates To:

ALL COMMERCIAL AND
INSTITUTIONAL INDIRECT
PURCHASER PLAINTIFFS ACTIONS

**DECLARATION OF WILLIAM
D. THOMSON IN SUPPORT OF
MOTION TO EXCLUDE THE
TESTIMONY OF DR. MICHAEL
WILLIAMS**

I, William D. Thomson, declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a partner with the law firm of Stinson LLP and am a member in good standing of the bars of the State of Minnesota and the District of Minnesota. I am one of the attorneys representing Defendant Seaboard Foods LLC in this matter. I am familiar with the matters that follow, and I make this declaration based on my own knowledge.

2. Attached to my declaration as exhibits are true and correct copies of the following documents:

Exhibit 1: Cited excerpts from the transcript of the June 21, 2022 deposition of Dr. Michael Williams (filed under seal).

Exhibit 2: Prepared Statement of Michael Scuse, Deputy Under Secretary of Agriculture, Farm and Foreign Agricultural Services Before the Subcommittee on Livestock, Dairy, and Poultry, Committee on Agriculture, U.S. House of Representatives dated October 22, 2009.

- Exhibit 3: *USDA Announces Plans to Buy Pork Products*, National Hog Farmer, dated April 1, 2009, <https://www.nationalhogfarmer.com/marketing/0401-USDA-helps-pork-crisis>.
- Exhibit 4: Maples, William E., B. Wade Brorsen, William F. Hahn, Matthew MacLachlan, and Lekhnath Chalise. February 2022. *Structure of the USDA Livestock and Poultry Baseline Model*, TB 1956, U.S. Department of Agriculture, Economic Research Service.
- Exhibit 5: Animal and Plant Health Inspection Service (APHIS) Factsheet, Questions & Answers: Porcine Epidemic Diarrhea Virus Reporting and Control, U.S. Department of Agriculture, dated April 2014.
- Exhibit 6: USDA Agricultural Projections to 2016. Office of the Chief Economist, World Agricultural Outlook Board, U.S. Department of Agriculture. Prepared by the Interagency Agricultural Projections Committee. Dated February 2007.
- Exhibit 7: *Life Cycle of a Market Pig*, Pork Checkoff, <https://porkcheckoff.org/pork-branding/facts-statistics/life-cycle-of-a-market-pig/> (last visited August 19, 2022).
- Exhibit 8: Paul Peil Deposition Exhibit 109, produced at HFC-PORKAT0000139342 (filed under seal).

- Exhibit 9: Rita Jane Gabbett, *Tyson Reducing Sow Heard Over the Next 10 Weeks*, American Association Swine Veterinarians (July 15, 2009), <https://www.aasv.org/news/story.php?id=3680>.
- Exhibit 10: Melvin Davis Deposition Exhibit 150, produced at SBF0063993 (filed under seal).
- Exhibit 11: Cited excerpts from the transcript of Melvin Davis dated December 16, 2021.

I declare under penalty of perjury that the foregoing is true and correct. Executed on August 24, 2022.

/s/ William D. Thomson
William D. Thomson